


Exhibit B

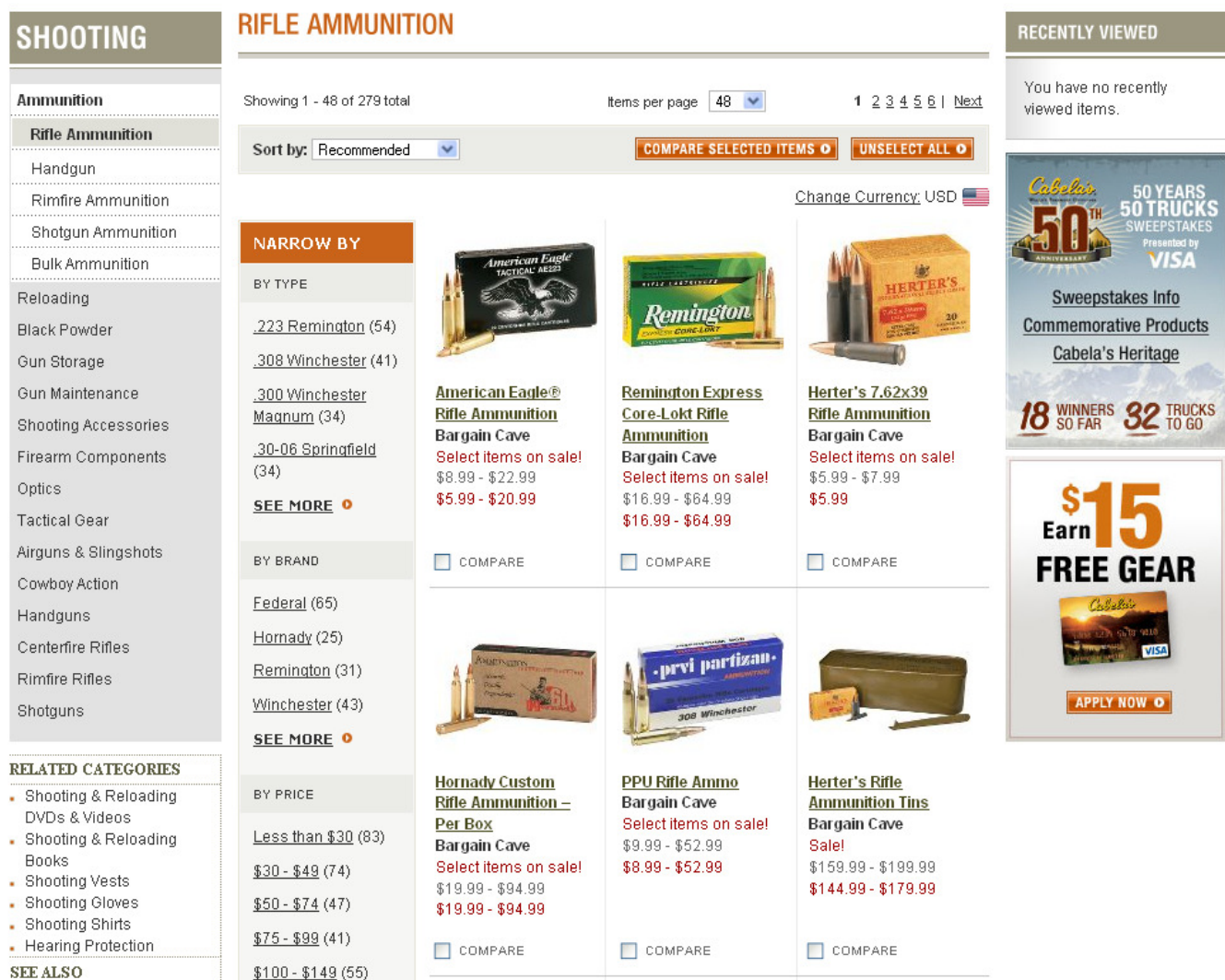
**To The Declaration of Benjamin Kleinman
In Support of Kelora Systems, LLC's
Opposition to Defendants' Claim
Construction Brief and Motion
For Summary Judgment of
Invalidity and Non-Infringement**

Appendix B to Kelora's Patent L.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions
Claim Chart Regarding Infringement of U.S. Patent 6,275,821 by Cabela's

I. ACCUSED INSTRUMENTALITY: CABELAS.COM

Claim	Accused Instrumentality
<p>Claim 1</p> <p>1. A method for assisting a user in identifying a subfamily of items within a family of items said method performed with a server connected to a client computer through a computer network, comprising the steps of:</p>	<p>Cabela's performs a method for assisting a user in identifying a subfamily of items within a family of items, the method performed with a server connected to a client computer through a computer network.</p> <p>In particular, for example, Cabela's servers that are connected to clients over the Internet at www.cabelas.com perform the method. In the example screenshots below, the method is used for assisting users in identifying subfamilies of items within families of items, including ammunition, boats, and clothes, among others.</p> 
<p>(a) providing a computer readable data file of stored information representing at least one family of items, said data file identifying at least one alternative for each item,</p>	<p>Cabela's provides via www.cabelas.com a computer readable data file of stored information representing at least one family of items, the data file identifying at least one alternative for each item.</p> <p>As can be seen in the illustrative screenshots, one of the many families of items is Rifle Ammunition. See http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_/N-1100190/Ns-CATEGORY_SEQ_104532480?WTz_I=SBC%3Bcat104792580%3Bcat104691780, reachable from www.cabelas.com by selecting "Shooting", then "Ammunition", and then "Rifle Ammunition".</p>
<p>(b) reading said data file,</p>	<p>Cabela's reads the data file.</p> <p>For example, it does so in the process of serving the page listing Rifle Ammunition at http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_/N-1100190/Ns-CATEGORY_SEQ_104532480?WTz_I=SBC%3Bcat104792580%3Bcat104691780.</p>

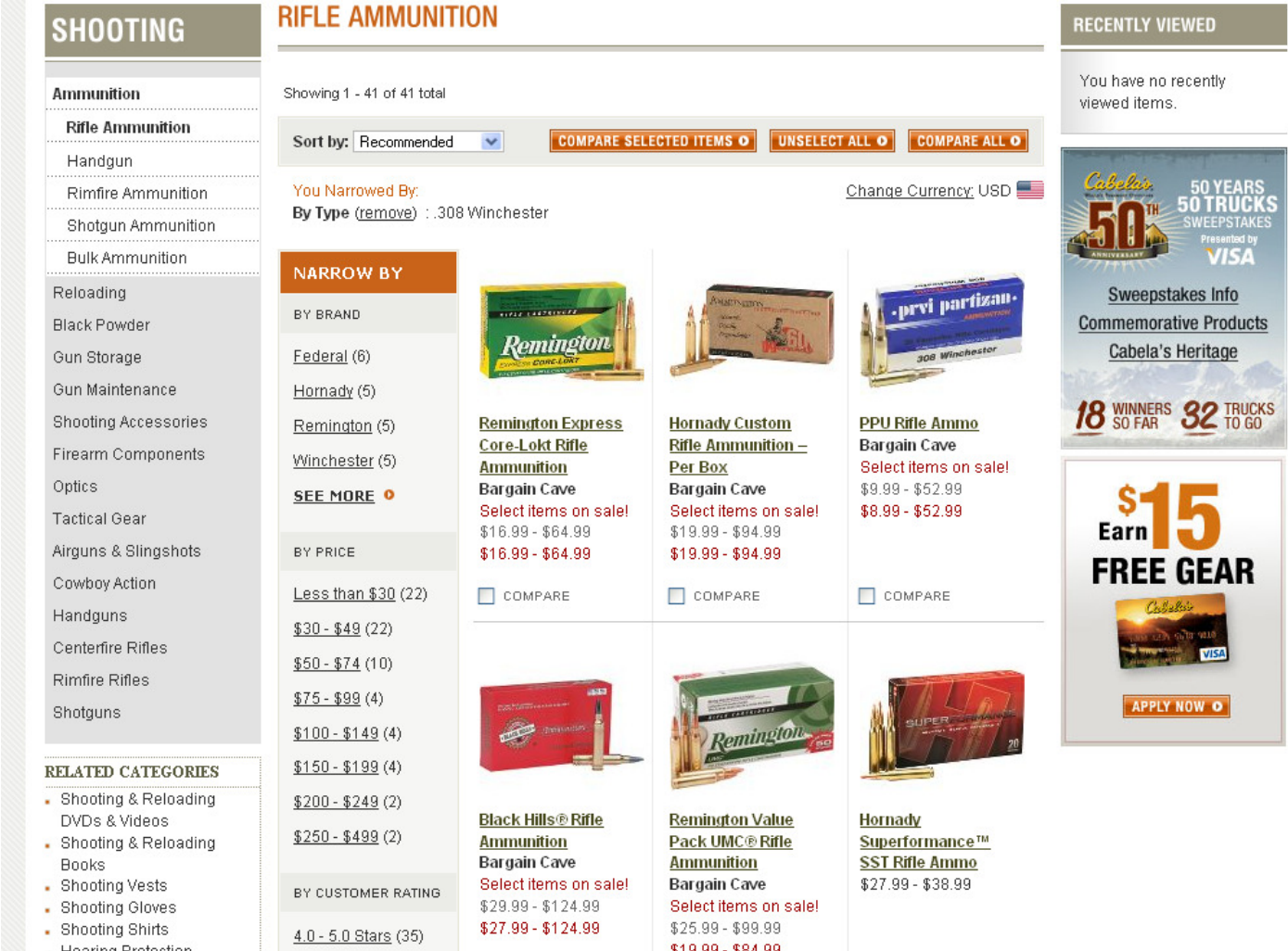
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 Claim Chart Regarding Infringement of U.S. Patent 6,275,821 by Cabela's

Claim	Accused Instrumentality
(c) displaying a feature screen indicating said alternatives represented in the family,	<p>Cabela's displays a feature screen indicating the alternatives represented in the family.</p> <p>As reflected in the below screenshot, Cabela's displays a feature screen indicating alternatives represented in the family of Rifle Ammunition at http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_/N-1100190/Ns-CATEGORY_SEQ_104532480?WTz_l=SBC%3Bcat104792580%3Bcat104691780. Along the left side of the page is a column listing available alternatives, including at least 4 alternatives for Type, at least 4 for Brand, and 11 for Price, among other alternatives.</p>  <p>The screenshot displays the 'RIFLE AMMUNITION' section of Cabela's website. On the left, a sidebar lists categories under 'SHOOTING' and 'RELATED CATEGORIES'. The main content area includes filters for 'NARROW BY' (Type, Brand, Price) and a grid of product listings. Each listing shows an image of the ammunition box, the brand name, the product name, and the price range. A 'COMPARE' button is present for each product. On the right, there are promotional banners for a 50th Anniversary sweepstakes and a \$15 off coupon.</p>

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Claim	Accused Instrumentality
(d) accepting a first selection criteria of at least one alternative,	<p>Cabela's accepts a first selection criteria of at least one alternative.</p> <p>For example, a selection criteria corresponding to the ".308 Winchester" alternative under the heading "Type" is accepted by Cabela's at www.cabelas.com. The selection criteria is used in step (e), below.</p>
(e) determining a first subfamily of items wherein each said item in the first subfamily satisfies said first selection criteria,	<p>Cabela's determines a first subfamily of items wherein each item in the first subfamily satisfies the first selection criteria.</p> <p>For example, Cabela's determines a first subfamily of items wherein each item in the first subfamily satisfies the first selection criteria corresponding to the ".308 Winchester" alternative.</p>
(f) determining available alternatives represented in the first subfamily,	<p>Cabela's determines available alternatives represented in the first subfamily.</p> <p>For example, Cabela's determines available alternatives in the first subfamily of Rifle Ammunition satisfying the first selection criteria corresponding to the ".308 Winchester" alternative. The results of the determination are used in step (g), below.</p>

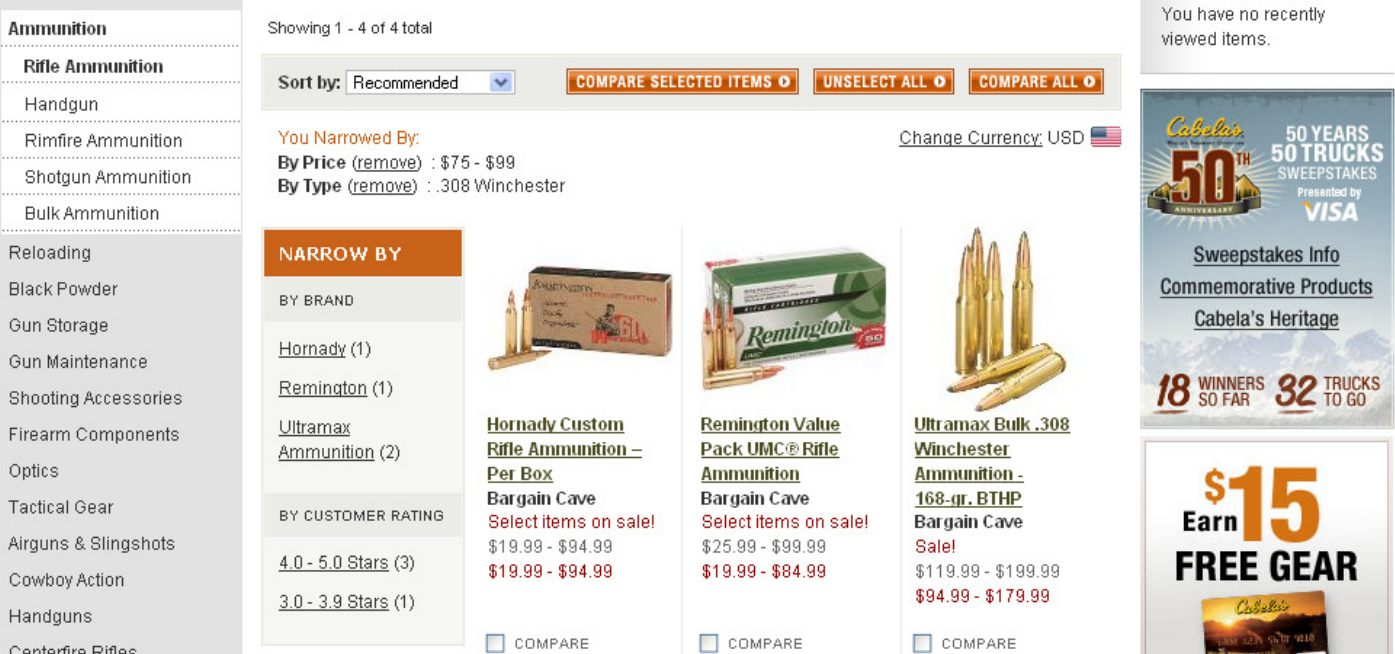
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 Claim Chart Regarding Infringement of U.S. Patent 6,275,821 by Cabela's

Claim	Accused Instrumentality
(g) revising said feature screen to indicate the available alternatives of the first subfamily,	<p>Cabela's revises the feature screen to indicate the available alternatives of the first subfamily.</p> <p>For example, Cabela's revises the feature screen to indicate the available alternatives of the first subfamily of Rifle Ammunition, as reflected in the below screenshot of http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_/N-1100190+4294754890/Ne-4294754890/Ns-CATEGORY_SEQ_104532480?WTz_l=SBC%3Bcat104792580%3Bcat104691780&WTz_st=GuidedNav&WTz_stype=GNU. The feature screen has been revised. For example, there are now 8 alternatives under Price.</p> 

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Claim Chart Regarding Infringement of U.S. Patent 6,275,821 by Cabela's

Claim	Accused Instrumentality
(h) accepting a second selection criteria from said client computer via said computer network at said server wherein the second selection criteria comprises a resubmission to the server of the alternative or alternatives of the first selection criteria plus at least one alternative selected from the revised feature screen,	<p>Cabela's accepts a second selection criteria from the client computer via the computer network at the server wherein the second selection criteria comprises a resubmission to the server of the alternative or alternatives of the first selection criteria plus at least one alternative selected from the revised feature screen.</p> <p>For example, a second selection criteria corresponding to the "\$75 - \$99" alternative under the "Price" heading and the ".308 Winchester" alternative of the first selection criteria is accepted by Cabela's at www.cabelas.com. This second selection criteria is used in step (i), below. This second selection criteria is reflected in the URL below, which includes a "\$75 - \$99" segment (highlighted in yellow), plus a ".308 Winchester" segment (highlighted in Green):</p> <p>http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_/N-1100190+10000050+4294754890/Ne-10000050/Ns-CATEGORY_SEQ_104532480?WTz_l=SBC%3Bcat104792580%3Bcat104691780&WTz_st=GuidedNav&WTz_stype=GNU</p>
(i) determining a second subfamily of items of the family wherein each item in the second subfamily satisfies said second selection criteria,	<p>Cabela's determines a second subfamily of items of the family wherein each item in the second subfamily satisfies the second selection criteria.</p> <p>For example, Cabela's determines a second subfamily of items of the family wherein each item in the second subfamily satisfies the second selection criteria, corresponding to the ".308 Winchester" and "\$75 - \$99" alternatives.</p>
(j) determining available alternatives represented in the second subfamily, and	<p>Cabela's determines available alternatives represented in the second subfamily.</p> <p>For example, Cabela's determines available alternatives represented in the second subfamily satisfying the second selection criteria. The results of the determination are used in step (k), below.</p>

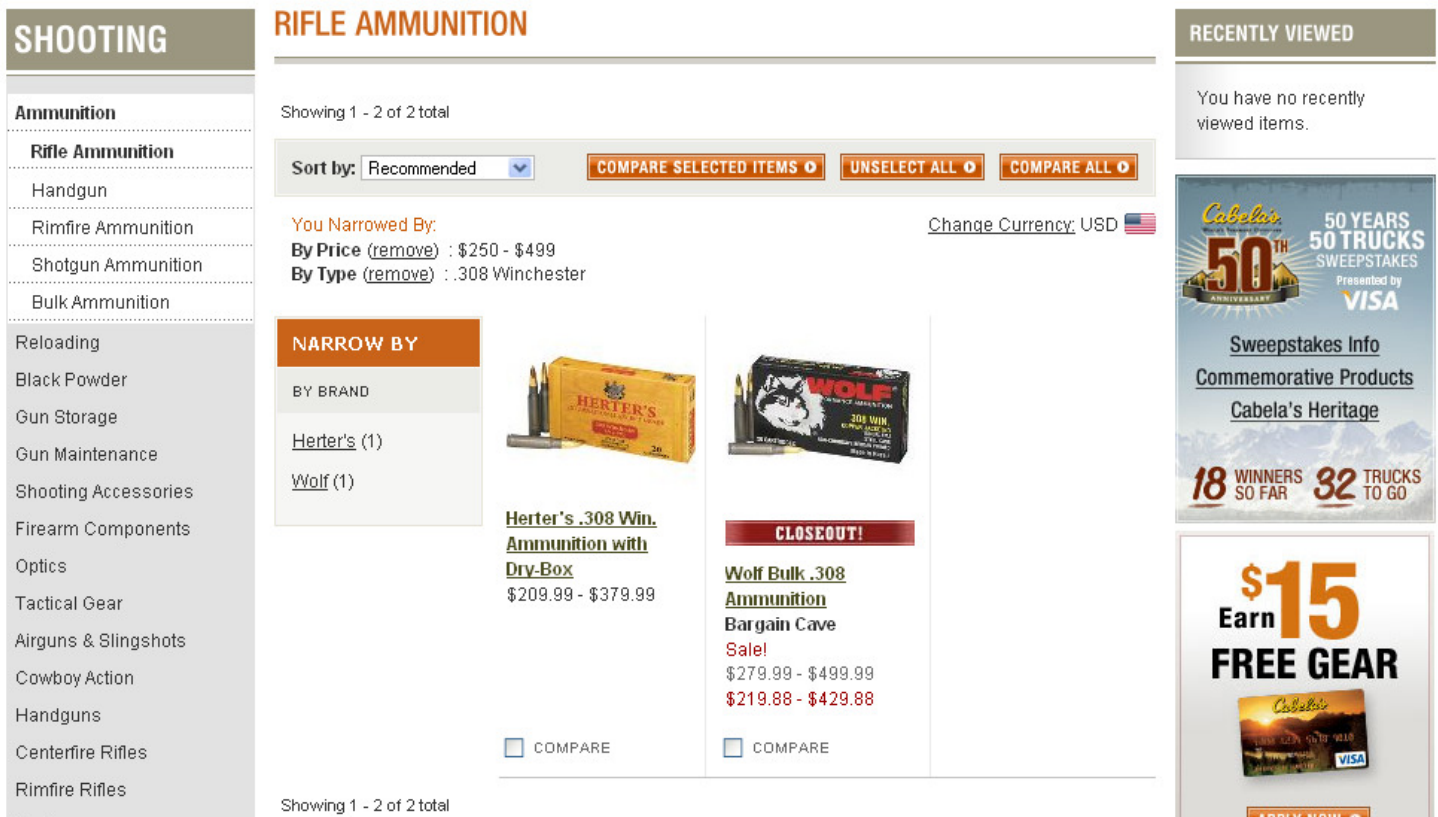
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Claim	Accused Instrumentality
(k) revising said feature screen to indicate the available alternatives of the second subfamily.	<p>Cabela's revises the feature screen to indicate the available alternatives of the second subfamily.</p> <p>For example, Cabela's revises the feature screen to indicate the available alternatives of the second subfamily, as reflected in the below screenshot of http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_/N-1100190+10000050+4294754890/Ne-10000050/Ns-CATEGORY_SEQ_104532480?WTz_l=SBC%3Bcat104792580%3Bcat104691780&WTz_st=GuidedNav&WTz_stype=GNU. The feature screen has been revised. For example, there are only three available alternatives for "Brand".</p>  <p>The screenshot shows the Cabela's website interface for rifle ammunition. On the left is a sidebar with navigation links: Ammunition, Rifle Ammunition, Handgun, Rimfire Ammunition, Shotgun Ammunition, Bulk Ammunition, Reloading, Black Powder, Gun Storage, Gun Maintenance, Shooting Accessories, Firearm Components, Optics, Tactical Gear, Airguns & Slingshots, Cowboy Action, Handguns, and Centerfire Rifles. The main content area shows 'Showing 1 - 4 of 4 total' items. It includes a 'Sort by' dropdown set to 'Recommended', buttons for 'COMPARE SELECTED ITEMS', 'UNSELECT ALL', and 'COMPARE ALL', and filters for 'You Narrowed By: By Price (\$75 - \$99)' and 'By Type (.308 Winchester)'. Below these are 'NARROW BY' sections for 'BY BRAND' (listing Hornady, Remington, and Ultramax) and 'BY CUSTOMER RATING' (listing 4.0-5.0 Stars and 3.0-3.9 Stars). Three product listings are shown: Hornady Custom Rifle Ammunition, Remington Value Pack UMC Rifle Ammunition, and Ultramax Bulk .308 Winchester Ammunition. Each listing includes an image, title, price range, and a 'COMPARE' button. The right sidebar contains promotional banners for '50 YEARS 50 TRUCKS SWEEPSTAKES' and '\$15 Earn FREE GEAR'.</p>


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Claim	Accused Instrumentality
Claim 2	
2. The method of claim 1 wherein each family has at least one feature associated therewith and further comprising the step of	<p>Cabela's performs the method of claim 1 (see above) wherein each family has at least one feature associated therewith.</p> <p>For example, each of the families illustrated above includes a "Brand" feature.</p>
displaying at least one grouping wherein each said grouping comprises one of said features visually related to respective alternatives.	<p>Cabela's displays at least one grouping wherein each grouping comprises one of the features visually related to respective alternatives.</p> <p>For example, as shown in the screenshots above, Cabela's displays a grouping including the "Brand" feature visually related to the alternatives for that feature, such as "Hornady" and other alternatives.</p>

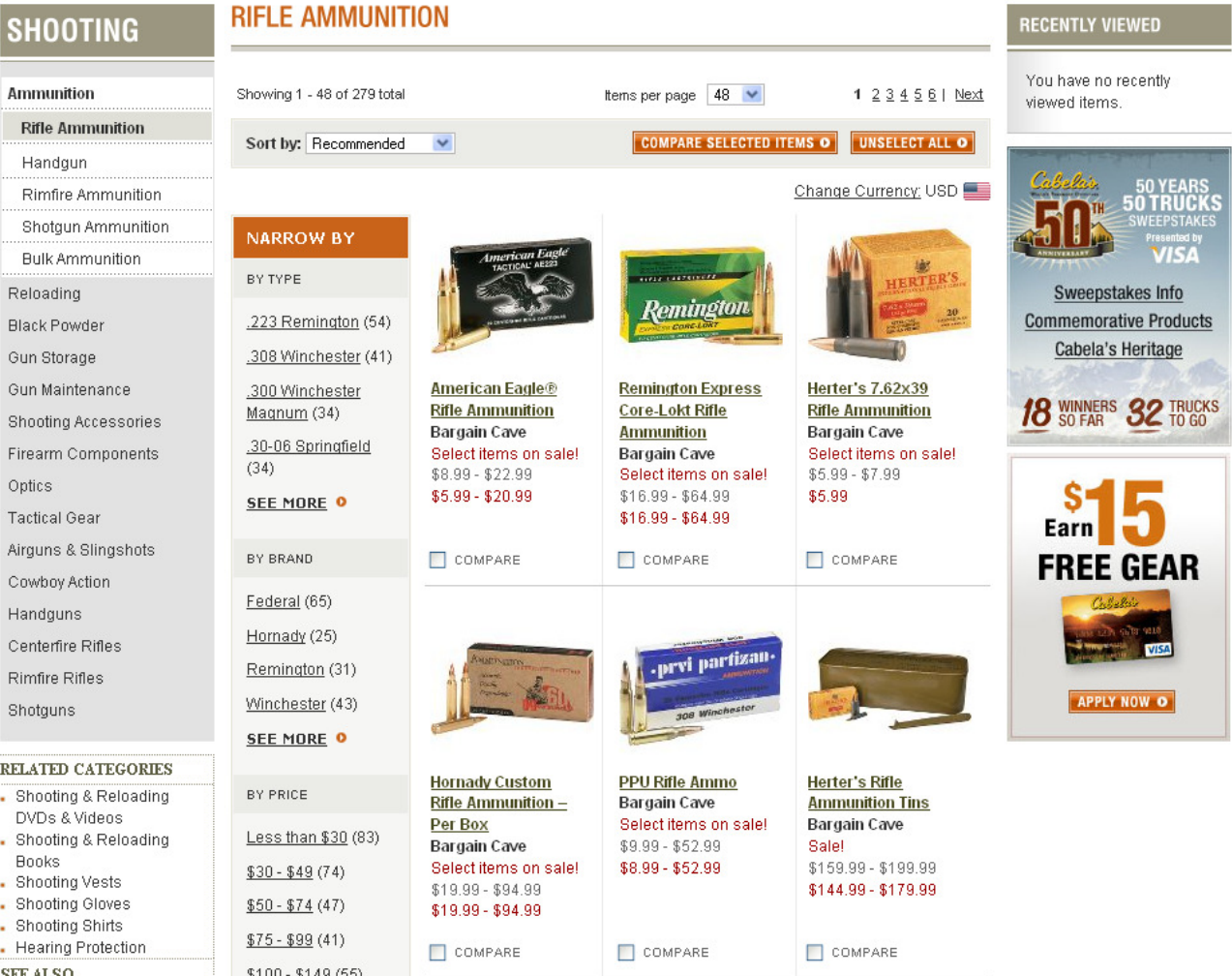
Appendix B to Kelora's Patent L.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions
Claim Chart Regarding Infringement of U.S. Patent 6,275,821 by Cabela's

Claim	Accused Instrumentality
Claim 4	
<p>4. The method according to claim 2 wherein at least one said groupings is hidden from view if all said respective alternatives are not available.</p>	<p>Cabela's performs the method of claim 2 (see above) wherein at least one grouping is hidden from view if all respective alternatives are not available.</p> <p>For example, Cabela's hides from view the grouping including the "By Customer Rating" feature, which is visible on http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_/N-1100190+4294754890/Ne-4294754890/Ns-CATEGORY_SEQ_104532480?WTz_l=SBC%3Bcat104792580%3Bcat104691780&WTz_st=GuidedNav&WTz_stype=GNU, as shown above, and hidden from view after a second selection criteria reflecting the ".308 Winchester" alternative and the "\$250-\$499" alternative under price is accepted by www.cabelas.com, as can be seen in the screenshot, below, of http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_/N-1100190+10000054+4294754890/Ne-10000054/Ns-CATEGORY_SEQ_104532480?WTz_l=SBC%3Bcat104792580%3Bcat104691780&WTz_st=GuidedNav&WTz_stype=GNU.</p>  <p>The screenshot shows the Cabela's website interface for rifle ammunition. On the left is a sidebar with a 'SHOOTING' header and a list of categories: Ammunition (Rifle, Handgun, Rimfire, Shotgun, Bulk), Reloading, Black Powder, Gun Storage, Gun Maintenance, Shooting Accessories, Firearm Components, Optics, Tactical Gear, Airguns & Slingshots, Cowboy Action, Handguns, Centerfire Rifles, and Rimfire Rifles. The main content area is titled 'RIFLE AMMUNITION' and shows 'Showing 1 - 2 of 2 total'. It includes a 'Sort by' dropdown set to 'Recommended' and buttons for 'COMPARE SELECTED ITEMS', 'UNSELECT ALL', and 'COMPARE ALL'. Below this, it shows 'You Narrowed By: By Price (remove) : \$250 - \$499' and 'By Type (remove) : .308 Winchester'. A 'NARROW BY' section lists 'BY BRAND' with 'Herter's (1)' and 'Wolf (1)'. Two product listings are shown: 'Herter's .308 Win. Ammunition with Dry-Box' priced at \$209.99 - \$379.99, and 'Wolf Bulk .308 Ammunition Bargain Cave Sale!' priced at \$279.99 - \$499.99 (now \$219.88 - \$429.88). The right sidebar features a 'RECENTLY VIEWED' section (empty) and two promotional banners: 'Cabela's 50 YEARS 50 TRUCKS SWEEPSTAKES' and '\$15 Earn FREE GEAR'.</p>

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Claim	Accused Instrumentality
Claim 9	
<p>9. A method for assisting a user in identifying a subfamily of items within a family of items, the method comprising the following steps which are performed with a server connected to a computer network:</p>	<p>Cabela's performs a method for assisting a user in identifying a subfamily of items within a family of items, the method comprising the following steps which are performed with a server connected to a computer network.</p> <p>In particular, for example, Cabela's servers that are accessible over the Internet at www.cabelas.com perform the method. In the example screenshots below, the method is used for assisting users in identifying subfamilies of items within families of items, including ammunition, boats, and clothes, among others.</p> 
<p>(a) providing a computer readable data file of stored information representing at least one family of items, said data file identifying at least one alternative for each item,</p>	<p>Cabela's provides via www.cabelas.com a computer readable data file of stored information representing at least one family of items, the data file identifying at least one alternative for each item.</p> <p>As can be seen in the illustrative screenshots, one of the many families is Rifle Ammunition. See http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_/N-1100190/Ns-CATEGORY_SEQ_104532480?WTz_I=SBC%3Bcat104792580%3Bcat104691780, reachable from www.cabelas.com by selecting "Shooting", then "Ammunition", and then "Rifle Ammunition".</p>
<p>(b) reading said data file,</p>	<p>Cabela's reads the data file.</p> <p>For example, it does so in the process of serving the page listing Rifle Ammunition at http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_/N-1100190/Ns-CATEGORY_SEQ_104532480?WTz_I=SBC%3Bcat104792580%3Bcat104691780.</p>

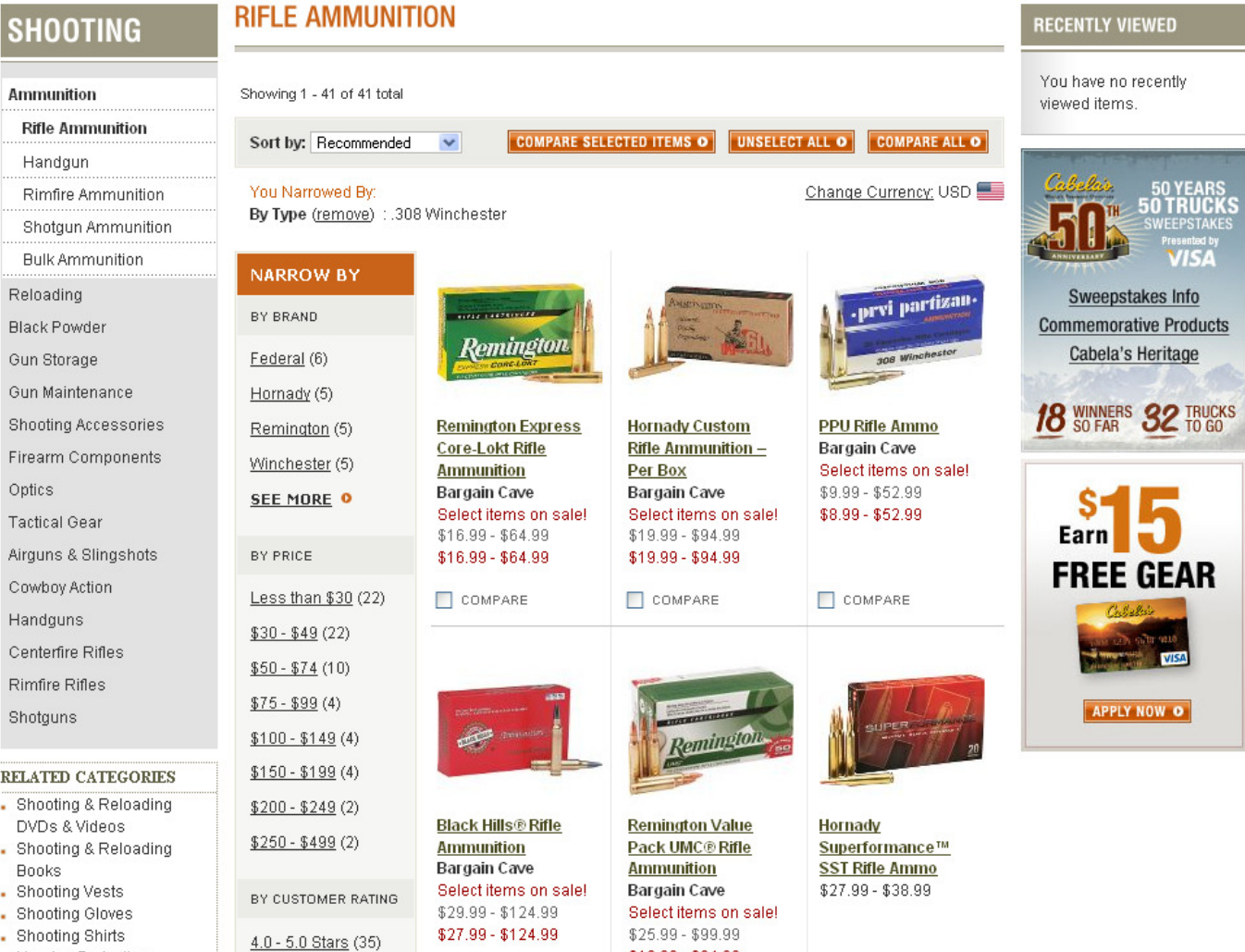
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Claim	Accused Instrumentality
(c) displaying a feature screen indicating said alternatives represented in the family wherein data is output to a client computer via said computer network,	<p>Cabela's displays a feature screen indicating the alternatives represented in the family wherein data is output to a client computer via the computer network.</p> <p>As reflected in the below screenshot, Cabela's displays a feature screen indicating alternatives represented in the family of Rifle Ammunition at http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_/N-1100190/Ns-CATEGORY_SEQ_104532480?WtZ_l=SBC%3Bcat104792580%3Bcat104691780. In so doing, it outputs, via the internet, to a client computer, data. Along the left side of the page is a column listing available alternatives, including at least 4 alternatives for Type, at least 4 for Brand, and 11 for Price, among other alternatives.</p>  <p>The screenshot displays the 'RIFLE AMMUNITION' section of Cabela's website. On the left, there is a sidebar with 'SHOOTING' categories including Ammunition, Rifle Ammunition, Handgun, Rimfire Ammunition, Shotgun Ammunition, Bulk Ammunition, Reloading, Black Powder, Gun Storage, Gun Maintenance, Shooting Accessories, Firearm Components, Optics, Tactical Gear, Airguns & Slingshots, Cowboy Action, Handguns, Centerfire Rifles, Rimfire Rifles, and Shotguns. Below these are 'RELATED CATEGORIES' such as Shooting & Reloading DVDs & Videos, Shooting & Reloading Books, Shooting Vests, Shooting Gloves, Shooting Shirts, and Hearing Protection. At the bottom of the sidebar is a 'SEE ALSO' section.</p> <p>The main content area shows 'Showing 1 - 48 of 279 total' items per page (48 selected). It includes a 'Sort by' dropdown set to 'Recommended', a 'COMPARE SELECTED ITEMS' button, and an 'UNSELECT ALL' button. A 'Change Currency: USD' link is also present. Below the sorting options are three filter sections: 'NARROW BY' (BY TYPE, BY BRAND, BY PRICE), each with a 'SEE MORE' link. The 'BY TYPE' section lists: .223 Remington (54), .308 Winchester (41), .300 Winchester Magnum (34), and .30-06 Springfield (34). The 'BY BRAND' section lists: Federal (65), Hornady (25), Remington (31), and Winchester (43). The 'BY PRICE' section lists: Less than \$30 (83), \$30 - \$49 (74), \$50 - \$74 (47), \$75 - \$99 (41), and \$100 - \$149 (55).</p> <p>The product grid displays six items, each with an image, name, and price range:</p> <ul style="list-style-type: none"> American Eagle® Rifle Ammunition Bargain Cave: Select items on sale! \$8.99 - \$22.99, \$5.99 - \$20.99 Remington Express Core-Lokt Rifle Ammunition Bargain Cave: Select items on sale! \$16.99 - \$64.99, \$16.99 - \$64.99 Herter's 7.62x39 Rifle Ammunition Bargain Cave: Select items on sale! \$5.99 - \$7.99, \$5.99 Hornady Custom Rifle Ammunition - Per Box Bargain Cave: Select items on sale! \$19.99 - \$94.99, \$19.99 - \$94.99 PPU Rifle Ammo Bargain Cave: Select items on sale! \$9.99 - \$52.99, \$8.99 - \$52.99 Herter's Rifle Ammunition Tins Bargain Cave: Sale! \$159.99 - \$199.99, \$144.99 - \$179.99 <p>Each item has a 'COMPARE' checkbox. On the right side of the page, there are two promotional banners: '50 YEARS 50 TRUCKS SWEEPSTAKES Presented by VISA' and '\$15 Earn FREE GEAR'.</p>

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Claim	Accused Instrumentality
(d) receiving and accepting a first selection criteria of at least one alternative from said client computer, said first selection criteria being received by said server from said client computer via said computer network,	<p>Cabela's receives and accepts a first selection criteria of at least one alternative from the client computer, the first selection criteria being received by the server from the client computer via the computer network.</p> <p>For example, a first selection criteria corresponding to the ".308 Winchester" alternative under the heading "Type" is received and accepted by Cabela's at www.cabelas.com. The selection criteria is used in step (e), below.</p>
(e) determining a first subfamily of items wherein each said item in the first subfamily satisfies said first selection criteria,	<p>Cabela's determines a first subfamily of items wherein each item in the first subfamily satisfies the first selection criteria.</p> <p>For example, Cabela's determines a first subfamily of items wherein each item in the first subfamily satisfies the first selection criteria corresponding to the ".308 Winchester" alternative.</p>
(f) determining available alternatives represented in the first subfamily,	<p>Cabela's determines available alternatives represented in the first subfamily.</p> <p>For example, Cabela's determines available alternatives in the first subfamily of Rifle Ammunition satisfying the first selection criteria corresponding to the ".308 Winchester" alternative. The results of the determination are used in step (g), below.</p>

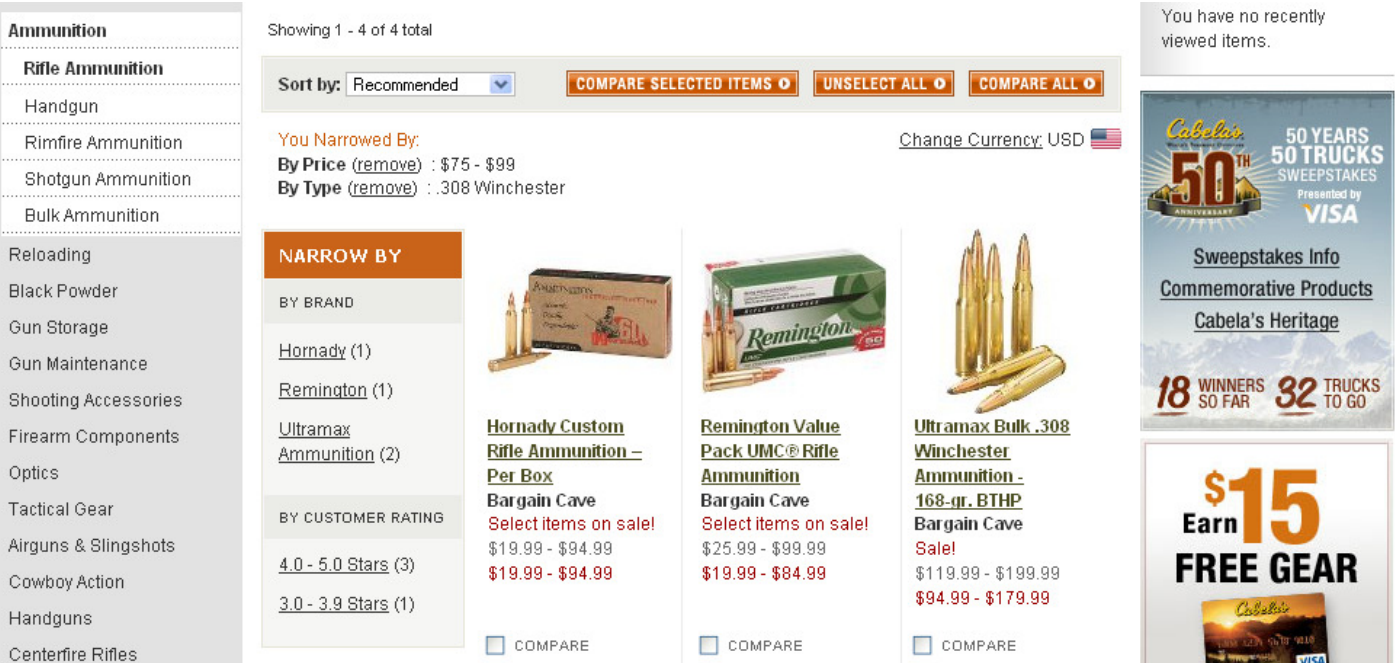
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<p>(g) revising said data for said feature screen to indicate the available alternatives of the first subfamily and outputting said revised data for said feature screen to said client computer via said computer network,</p>	<p>Cabela's revises the data for the feature screen to indicate the available alternatives of the first subfamily and outputs the revised data for the feature screen to the client computer via the computer network.</p> <p>For example, Cabela's revises the data for the feature screen to indicate the available alternatives of the first subfamily of Rifle Ammunition and outputs that revised data to the client computer via the Internet, as reflected in the below screenshot of http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_/N-1100190+4294754890/Ne-4294754890/Ns-CATEGORY_SEQ_104532480?WTz_l=SBC%3Bcat104792580%3Bcat104691780&WTz_st=GuidedNav&WTz_stype=GNU. The data for the feature screen has been revised. For example, there are now 8 alternatives under Price.</p> 

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Claim	Accused Instrumentality
(h) receiving and accepting a second selection criteria from said client computer via said computer network, in which said second selection criteria comprises (1) a resubmission by said client computer of the alternative or alternatives of the first selection criteria along with (2) at least one alternative selected from the revised feature screen,	<p>Cabela's receives and accepts a second selection criteria from the client computer via the computer network, in which the second selection criteria comprises (1) a resubmission by the client computer of the alternative or alternatives of the first selection criteria along with (2) at least one alternative selected from the revised feature screen.</p> <p>For example, a second selection criteria corresponding to the "\$75 - \$99" alternative under the "Price" heading and the ".308 Winchester" alternative of the first selection criteria is received and accepted by Cabela's at www.cabelas.com. This second selection criteria is used in step (i), below. This second selection criteria is reflected in the URL below, which includes a "\$75 - \$99" segment (highlighted in yellow), plus a ".308 Winchester" segment (highlighted in Green):</p> <p>http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_/N-1100190+10000050+4294754890/Ne-10000050/Ns-CATEGORY_SEQ_104532480?WTz_l=SBC%3Bcat104792580%3Bcat104691780&WTz_st=GuidedNav&WTz_stype=GNU</p>
(i) determining a second subfamily of items of the family wherein each item in the second subfamily satisfies said second selection criteria,	<p>Cabela's determines a second subfamily of items of the family wherein each item in the second subfamily satisfies the second selection criteria.</p> <p>For example, Cabela's determines a second subfamily of items of the family wherein each item in the second subfamily satisfies the second selection criteria, corresponding to the ".308 Winchester" and "\$75 - \$99" alternatives.</p>
(j) determining available alternatives represented in the second subfamily, and	<p>Cabela's determines available alternatives represented in the second subfamily.</p> <p>For example, Cabela's determines available alternatives represented in the second subfamily satisfying the second selection criteria. The results of the determination are used in step (k), below.</p>

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Claim	Accused Instrumentality
(k) revising said data for said feature screen to indicate the available alternatives of the second subfamily and outputting said revised data for said feature screen to said client computer via said computer network.	<p>Cabela's revises the data for the feature screen to indicate the available alternatives of the second subfamily and outputs the revised data for the feature screen to the client computer via the computer network.</p> <p>For example, Cabela's revises the data for the feature screen to indicate the available alternatives of the second subfamily, as reflected in the below screenshot of http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_/N-1100190+10000050+4294754890/Ne-10000050/Ns-CATEGORY_SEQ_104532480?WTz_l=SBC%3Bcat104792580%3Bcat104691780&WTz_st=GuidedNav&WTz_stype=GNU. The data has been revised. For example, there are only three available alternatives for "Brand". The data is output to the client computer via the Internet.</p> 

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